

**UNITED STATES DISTRICT
COURT NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION**

ANGELICA JUNIOUS,)	
)	
Plaintiff,)	
)	Case No. 22 CV 3681
v.)	
)	Honorable Judge Chang
SGT. W. BAKER #3159,)	
R/O C. CHENGARY #16269,)	
R/LT PURCELL #758,)	Magistrate Judge Valdez
OFFICER NEALON # 18420)	
OFFICER WALZ #18563)	
OFFICER RAHN #17086,)	
)	
OFFICER GLAZIERS, COOK COUNTY)	
SHERIFF TOM DART,)	
and COOK COUNTY, ILLINOIS,)	JURY TRIAL DEMANDED
)	
Defendants.)	

**PLAINTIFF’S MOTION TO SET THE EXPERT DISCOVERY AND
TRIAL-RELATED SCHEDULE**

Pursuant to Fed. R. Civ. P. 16, Plaintiff requests an order setting a schedule for disclosure of expert witnesses and remaining trial-related tasks, including preparation of a final pre-trial order, pre-trial conference, and trial date, stating the following in support:

1. This is a §1983 action involving the December 30, 2021 sexual assault of Plaintiff, who is a former pre-trial detainee at Cook County Jail. Plaintiff was placed in a cell with an adjoining door that connected her cell with another cell occupied by a male inmate. The male inmate gained entry into Plaintiff’s cell and sexually assaulted her.
2. The parties exchanged extensive written fact discovery. Fact discovery closed on

June 30, 2023.¹

3. Currently there is no deadline for the parties to make expert disclosures pursuant to Fed. R. Civ. P. 26(a)(2). Plaintiff intends to disclose Plaintiff's treating psychiatric team who are expected to render expert opinions about Plaintiff's emotional state and a causal connection with being sexually assaulted. As such, this opinion testimony is governed by Fed. R. Evid. 701 and must be disclosed pursuant to Rule 26(a)(2). Plaintiff is proposing the following schedule:

- (a) Plaintiff to make her Rule 26(a)(2) disclosure on Friday, August 4, 2023;
- (b) Defendants to take the deposition, if any, of Plaintiff's Rule 26(a)(2) witness by September 8, 2023;
- (c) Defendants to disclose Rule 26(a)(2) witnesses, if any, by October 6, 2023;
- (d) Plaintiff to take the deposition, if any, of Defendants' Rule 26(a)(2) witness by November 6, 2023.

6. Plaintiff further proposes that trial be scheduled to commence on **December 11, 2023**, with a proposed final pre-trial order to be submitted no later than **November 24, 2023** and that a pre-trial conference be set for a time on or around **December 4, 2023**.

WHEREFORE, for the reasons set forth above, Plaintiff respectfully requests that this Honorable Court enter an order: (1) entering an expert disclosure schedule, as proposed above; (2) entering the trial and pre-trial filing dates, as proposed above.

¹ Defendant Jacquetta Nealon, represented by separate counsel, has requested and received by agreement, an extension of time to answer interrogatories and production requests on July 7, 2023. Nealon's responses were originally due June 2, 2023. Plaintiff agreed to this extension to Defendant Nealon's counsel as a professional courtesy to counsel who was having apparent difficulties reaching her client during that time.

CERTIFICATE OF SERVICE

The undersigned certifies that on June 30, 2023, the foregoing **PLAINTIFF'S MOTION TO SET THE EXPERT DISCOVERY AND TRIAL-RELATED SCHEDULE** was electronically filed with the Clerk of the United States District Court for the Northern District of Illinois by filing through the CM/ECF system, which served a copy of the foregoing upon all counsel of record.

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/s/ Devlin Joseph Schoop